

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

UNITED STATES OF AMERICA,  
*Plaintiff*

VERSUS

CATAHOULA PARISH SCHOOL  
BOARD, *et al.*,  
*Defendants*

\* CIVIL ACTION NO. 69-14430 (LEAD)  
\* CIVIL ACTION NO. 19-01094 (MEMBER)  
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\* JUDGE ROBERT G. JAMES  
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**MEMORANDUM IN SUPPORT OF MOTION TO SEAL EXHIBIT B  
TO RESPONSE OF CATAHOULA PARISH SCHOOL BOARD TO SMITH LETTER**

**MAY IT PLEASE THE COURT:**

The Catahoula Parish School Board (the “Board”) respectfully requests that this Court issue an order to allow it to file under seal Exhibit B to its Response to Ms. Jill Lossin Smith’s letter. Exhibit B contains sensitive identifying, personal, and health information because it contains E.S.’s individualized healthcare plan. The Board seeks to protect this information from disclosure in order to protect E.S.’s privacy.

Accordingly, the Board respectfully requests that this Court enter an order permitting Exhibit B to be filed under seal.

**Respectfully submitted**, this the 9<sup>th</sup> day of October 2019.

**CATAHOULA PARISH SCHOOL BOARD**

**HAMMONDS, SILLS, ADKINS & GUICE, LLP**  
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*s/ John Richard Blanchard*  
**ROBERT L. HAMMONDS**  
Bar Roll No. 6484

**PAMELA WESCOVICH DILL**

Bar Roll No. 31703

**JOHN RICHARD BLANCHARD**

Bar Roll No. 37036

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the above and foregoing MEMORANDUM was filed electronically with the Clerk of Court by use of the CM/ECF system, which will send a notice of electronic filing to counsel registered with the Court for receipt of pleadings by e-mail.

I do hereby further certify that, on the date stated below, a true and correct copy of the above foregoing MEMORANDUM and accompanying Exhibits, in print format, was forwarded via U.S. mail to Ms. Jill Lossin Smith at the following address which was listed on her letter to the Court:

Jill Lossin Smith  
21835 Hwy 124  
Jonesville, Louisiana 71343

**BATON ROUGE, LOUISIANA**, this the 9<sup>th</sup> day of October 2019.

*s/ John Richard Blanchard*

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**JOHN RICHARD BLANCHARD**

Bar Roll No. 37036